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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

YITZCHOK FRANKEL *et al.*,

Plaintiffs,

v.

REGENTS OF THE UNIVERSITY
OF CALIFORNIA *et al.*,

Defendants.

Case No.: 2:24-cv-4702

**THIRD DECLARATION OF
ERIC RASSBACH**

Judge: Hon. Mark C. Scarsi
Hearing: May 12, 2025, 9:00 a.m.
Courtroom: 7C

*Admitted *pro hac vice*. ‡Not admitted to the D.C. Bar; admitted only in Texas. Supervised by licensed D.C. Bar members.

1 I, Eric Rassbach, declare and state as follows:

2 1. My name is Eric Rassbach. I am one of the attorneys representing
3 Plaintiffs in this action. I am submitting this declaration in support of
4 Plaintiffs' Motion for Partial Summary Judgment and Permanent
5 Injunction. I have personal knowledge of the contents of this declaration.
6

7 2. Exhibit 1 to this declaration is a true and correct copy of a report
8 dated October 16, 2024, by The Task Force to Combat Antisemitism and
9 Anti-Israeli Bias at UCLA entitled "Antisemitism and Anti-Israeli Bias
10 at UCLA," retrieved from the website <https://antisemitismreport.org/>.
11

12 3. Exhibit 2 to this declaration is a true and correct copy of a report
13 dated November 2024 by 21st Century Policing Solutions entitled
14 "Independent Investigation & After-Action Review of Encampment-
15 Related Events at the University of California, Los Angeles, April 2024
16 through May 6, 2024: Recommendations," retrieved from the University
17 of California website at [https://www.universityofcalifornia.edu/sites/
18 default/files/2024-11/UCLA-independent-investigation-and-after-action-
19 review-recommendations-21CP-solutions.pdf](https://www.universityofcalifornia.edu/sites/default/files/2024-11/UCLA-independent-investigation-and-after-action-review-recommendations-21CP-solutions.pdf).
20

21 4. Exhibit 3 to this declaration is a true and correct copy of a report
22 published on October 31, 2024, by the U.S. House of Representatives
23 Committee on Education and the Workforce entitled "Antisemitism on
24 College Campuses Exposed," retrieved from the Committee's website at
25 [https://edworkforce.house.gov/uploadedfiles/10.30.24_committee_on_education_and_the_workforce_republican_staff_report_-
26 _antisemitism_on_college_campuses_exposed.pdf](https://edworkforce.house.gov/uploadedfiles/10.30.24_committee_on_education_and_the_workforce_republican_staff_report_-_antisemitism_on_college_campuses_exposed.pdf).
27
28

1 5. Exhibit 4 to this declaration is a true and correct copy of a report
2 dated December 18, 2024, by the U.S. House of Representatives entitled
3 “U.S. House of Representatives Staff Report on Antisemitism,” retrieved
4 from Speaker of the House of Representatives’ website at
5 [https://www.speaker.gov/wp-content/uploads/2024/12/House-](https://www.speaker.gov/wp-content/uploads/2024/12/House-Antisemitism-Report.pdf)
6 [Antisemitism-Report.pdf](https://www.speaker.gov/wp-content/uploads/2024/12/House-Antisemitism-Report.pdf).
7

8 6. Exhibit 5 to this declaration is a true and correct copy of a letter
9 dated December 20, 2024, addressed to Michael Drake and attributed to
10 Anamaria Loya of the United States Department of Education Office for
11 Civil Rights, retrieved from the Department of Education’s website at
12 [https://ocrcas.ed.gov/sites/default/files/ocr-letters-and-](https://ocrcas.ed.gov/sites/default/files/ocr-letters-and-agreements/09222257-a.pdf)
13 [agreements/09222257-a.pdf](https://ocrcas.ed.gov/sites/default/files/ocr-letters-and-agreements/09222257-a.pdf).
14

15 7. Exhibit 6 to this declaration is a true and correct copy of a document
16 dated December 18, 2024, entitled “Resolution Agreement,” retrieved
17 from the Department of Education’s website at
18 [https://ocrcas.ed.gov/sites/default/files/ocr-letters-and-](https://ocrcas.ed.gov/sites/default/files/ocr-letters-and-agreements/09222257-b.pdf)
19 [agreements/09222257-b.pdf](https://ocrcas.ed.gov/sites/default/files/ocr-letters-and-agreements/09222257-b.pdf).
20

21 8. Exhibit 7 to this declaration is a true and correct copy of a policy
22 document published by the Administrative Vice Chancellor’s Office under
23 Defendant Michael Beck on September 4, 2024, retrieved from the UCLA
24 website at <https://www.adminpolicies.ucla.edu/APP/Number/850.0>.
25

26 9. Exhibit 8 to this declaration is a true and correct copy of a news
27 release published on May 8, 2024, by the UCLA Police Department,
28 retrieved from the UCLA Police Department’s website at

1 <https://police.ucla.edu>. That website, in turn, provides a link to the news
2 release at <https://ucla.app.box.com/v/Statement-240894>.

3 10. Exhibit 9 to this declaration is a true and correct copy of a post
4 published on October 21, 2024, on the UCLA Police Department
5 Facebook page, retrieved from
6 <https://www.facebook.com/share/p/1BAh9hT8fY/>.
7

8 11. Exhibit 10 to this declaration is a true and correct copy of a post
9 published on November 20, 2024, on the UCLA Police Department
10 Facebook page, retrieved from
11 [https://www.facebook.com/story.php/?story_fbid=977766661051144&id=](https://www.facebook.com/story.php/?story_fbid=977766661051144&id=100064534580527&_rdr)
12 [100064534580527&_rdr](https://www.facebook.com/story.php/?story_fbid=977766661051144&id=100064534580527&_rdr).
13

14 12. Exhibit 11 to this declaration is a true and correct copy of a news
15 release published on January 7, 2025, by UCLA Newsroom, retrieved
16 from the UCLA website at [https://newsroom.ucla.edu/stories/julio-frenk-](https://newsroom.ucla.edu/stories/julio-frenk-begins-role-as-ucla-chancellor-message)
17 [begins-role-as-ucla-chancellor-message](https://newsroom.ucla.edu/stories/julio-frenk-begins-role-as-ucla-chancellor-message).
18

19 13. Exhibit 12 to this declaration is a true and correct copy of a news
20 release published on January 21, 2025, by UCLA Newsroom, retrieved
21 from the UCLA website at [https://newsroom.ucla.edu/appointment-of-](https://newsroom.ucla.edu/appointment-of-steve-lurie-as-associate-vice-chancellor-for-campus-and-community-safety)
22 [steve-lurie-as-associate-vice-chancellor-for-campus-and-community-](https://newsroom.ucla.edu/appointment-of-steve-lurie-as-associate-vice-chancellor-for-campus-and-community-safety)
23 [safety](https://newsroom.ucla.edu/appointment-of-steve-lurie-as-associate-vice-chancellor-for-campus-and-community-safety).
24

25 14. The following is a true and accurate link to a video posted on
26 May 23, 2024, to the YouTube page of the U.S. House of Representatives
27 Committee on Education and the Workforce: <https://bit.ly/3R8V3FD>.
28

Executed this 3rd day of February, 2025.

/s/ Eric C. Rassbach

Eric C. Rassbach